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Attorneys for Plaintiff

LAURI VALJAKKA

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No. 4:22-cv-01490-JST

**DECLARATION OF ONNI HIETALAHTI
IN SUPPORT OF MOTION FOR LEAVE
TO SUPPLEMENT SUMMARY
JUDGMENT RECORD BASED ON
ARGUMENTS RAISED AT THE
HEARING UNDER RULE 56 (D) AND (E)**

Judge: Hon. Jon S. Tigar

Date: _____

Time: 2:00 p.m.

Crtrm: 6 – 2nd Floor

1. I, Onni Hietalahti, have personal knowledge of the facts contained herein, which are true and correct. If called as a witness, I could competently testify to these statements:
2. I am an attorney Licensed in Finland.
3. I have represented Lauri Valjakka from 2009 to the present. Mr. Valjakka approached me in 2010 to discuss his remedies for Suomen Biisi Oy letting his application go abandoned. He explained to me the steps he had taken since learning of the abandonment as he a part owner of SBO did not intend for the application to be abandoned.
4. I consulted with Jarno Tepora, a respected professor of Finnish Law on ownership of property. He informed me that Lauri Valjakka did in fact own the DMTS invention under Finnish Common law for the reasons he stated in his expert declaration served on or about July, 2023 (“Tepora Expert Declaration”).
5. To confirm the Tepora Expert Declaration, I made application for Valjakka in the Helsinki Market Court, a court with jurisdiction to establish ownership of property.
6. To date, Valjakka’s application has not been accepted. However, I expect acceptance or rejection no later than early 2024.
7. Once we have any indication from the Market Court about whether it will receive the application, we will produce the materials as relevant to the Patent-in-Suit.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 4, 2023.



Onni Hietalahti